

REMARKS/ARGUMENTS

Status of the Claims

Claims 1-27 are currently pending in the application. Claims 2-13, 16, 17 and 23 have been amended. No claims have been added. Claims 1 and 15 have been cancelled. Therefore, claims 2-14 and 16-27 are present for examination. Applicants respectfully request reconsideration of this application as amended.

Claim Rejections Under 35 U.S.C. § 101

Claims 1-12 have been rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Claim 1 has been canceled and claims 2-12 have been amended to overcome this rejection. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claim Rejections Under 35 U.S.C. § 103

Claims 1-13, 16-18 and 27 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0064375 A1 to Randell et al. (“**Randell**”) in view of U.S. Patent Application Publication No. 2003/0020858 A1 to Lam et al. (“**Lam**”) and further in view of U.S. Patent Application Publication No. 2008/0052230 A1 to Crane et al. (“**Crane**”).

Claim 13, as amended, in pertinent part, recites “determining that the weighted matching score is above a global matching scoring threshold.” In contrast, Randell discloses at paragraph 0015 that “the *level of match is indicative of either one of a complete match, a match with variances or an unreconciled item*. The account reconciliation data may further include data indicative of differences between the remittance detail data and the corresponding request for payment when the level of match is indicative of a match with variances. A user associated to the customer entity is enabled to provide explanation data in association with the account reconciliation data” (emphasis provided).

Hence, Randell determines the level (or quality) of a match in one of three ways: a complete match (*i.e.*, 100% match), a match with variances (*i.e.*, a match of less than 100%), or an unreconciled item (*i.e.*, a non-matched item). However, claim 13 recites a global matching score threshold, which if the threshold is exceeded then a match recommendation is generated. Whereas, in Randell, the match is simply labeled with three different quality levels, but no threshold is check against or even disclosed. Thus, for at least this reason, Applicants submit that Randell fails to teach or suggest each and every element of claim 13 and similarly claim 16.

Furthermore, claims 13 and 16 recite, in part “accessing remittance lines, transaction information, and a matching rule that assigns a weight to a plurality of parameters considered in said matching, wherein the matching rule organizes the parameters into a tree structure according to significance of each of the parameters.” Applicants submit that neither Randell or Lam teach or even suggest these features.

The Office Action relies on Lam (paragraphs 0026-0028, 0098, and 0102) to teach “a matching rule that assigns a weight to a plurality of parameters considered in said matching” as recited in Applicants’ claim 13. But, Lam does not teach or even suggest that “the matching rule organizes the parameters into a tree structure according to significance of each of the parameters” as recited in claim 13. Lam merely describes applying different weights to different attributes when matching a remittance record to payer information in a global payer directory (see Lam, paragraph 0098), and that “fuzzy attributed weight based matching” may be used to match existing vendor names and addresses from an accounts payable system with self enrolled vendor information in the global directory (see Lam, paragraph 01028). None of the cited portions of Lam teach or even suggest that matching rules where parameters are organized into a hierarchical tree structure as recited in claim 13, nor were Applicants able to identify any such teachings anywhere else in the disclosure of Lam. Randell and Crane do not remedy the deficiencies of Lam:

Additionally, Lam and Crane fail to remedy the shortcomings of Randell, thus for at least the same reasons as those with regard to Randell, Applicants submit that Lam and Crane fail to teach or suggest each and every element of claims 13 and 16. Accordingly, Applicants

submit that Randell, Lam, and Crane, individually or when combined in any combination fail to teach or suggest each and every element of claims 13 and 16.

Claims 2, 3, 5, 12, and 14 depend from claim 13, and claims 17, 18, 20 and 27 depend from claim 16, and claims 2, 3, 5, 12, 14, 17, 18, 20 and 27 are also in condition for allowance at least due to their dependence from claims 13 and 16, respectively.

Accordingly, withdrawal of the rejection of claims 2-14 and 16-27 is respectfully requested.

Claims 4 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam and further in view of Koller et al. (U.S. Patent Application Publication No. 2002/0103793) (hereinafter “**Koller**”).

Claim 4 depends from claim 13, and claim 19 depends from claim 16, and the rejection of claims 13 and 16 is premised on the assertion that Randell and Lam disclose or suggest the features recited in claims 13 and 16 and Koller discloses or suggests the remaining features of claims 4 and 19. As discussed above, however, Randell and Lam do not disclose or suggest all features recited in claim 13. As best understood, Koller provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 4 and 19 is respectfully requested.

Claims 5 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam, Crane and further in view of Sanders et al. (U.S. Patent Application Publication No. 2003/0158111) (hereinafter “**Sanders**”).

Claim 5 depends from claim 13 and claim 20 depends from claim 16, and the rejection of claims 13 and 16 are premised on the assertion that Randell, Crane, and Lam disclose or suggest the features recited in claim 13 and Sanders discloses or suggests the remaining features of claims 5 and 20. As discussed above, however, Randell and Lam do not disclose or suggest all features recited in claims 13 and 16. As best understood, Sanders

provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 5 and 20 is respectfully requested.

Claims 6, 9, 15, 21, and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam, Crane and further in view of Anglum (U.S. Patent Application Publication No. 2003/0065595) (hereinafter “**Anglum**”), Templeton et al. (U.S. Patent No. 5,679,940) (hereinafter “**Templeton**”), and Harper (U.S. Patent Application Publication No. 2003/0212654) (hereinafter “**Harper**”).

Claims 6 and 9 depend from claim 13 and claim 21 and 24 depend from claim 16, and the rejection of claims 6, 9, 21, and 24 is premised on the assertion that Randell, Crane and Lam disclose or suggest the features recited in claims 13, and 16 and Anglum, Templeton, and Harper disclose or suggest the remaining features of claims 6, 9, 21, and 24. As discussed above, however, Randell, Crane and Lam do not disclose or suggest all features recited in claims 13, and 16. As best understood, Anglum, Templeton, and Harper provide no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 6, 9, 21, and 24 is respectfully requested.

Claims 7 and 8 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam and Crane and further in view of Kilpatrick et al. (U.S. Patent No. 6,742,124) (hereinafter “**Kilpatrick**”).

Claims 7 and 8 depends from claim 13, and the rejection of claim 13 is premised on the assertion that Randell, Crane and Lam disclose or suggest the features recited in claim 13 and Kilpatrick discloses or suggests the remaining features of claims 7 and 8. As discussed above, however, Randell, Crane and Lam do not disclose or suggest all features recited in claim 13. As best understood, Kilpatrick provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 7 and 8 is respectfully requested.

Claims 10 and 25 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam and Crane, Anglum, Templeton, Harper, and further in view of Hey et al. (U.S. Patent Application Publication No. 2004/0208907) (hereinafter **"Hey"**), Shurling et al. (U.S. Patent No. 6,424,951) (hereinafter **"Shurling"**), and Falcone et al. (U.S. Patent Application Publication No. 2002/0194096) (hereinafter **"Falcone"**).

Claims 10 depends from claim 6 and claim 25 depends from claim 21, and the rejection of claims 10 and 16 is premised on the assertion that Randell, Lam, Crane, Anglum, Templeton, and Harper disclose or suggest the features recited in claims 13 and 16 and Hey and Shurling disclose or suggest the remaining features of claims 10 and 25. As discussed above, however, Randell, Lam, Crane, Anglum, Templeton, and Harper do not disclose or suggest all features recited in claims 6 and 21. As best understood, Anglum, Templeton, and Harper provide no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 10 and 25 is respectfully requested.

Claims 11 and 26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam, Crane, Anglum, Templeton, Harper, Hey, Shurling, Falcone, and further in view of Cuthbertson et al. (U.S. Patent No. 5,724,597) (hereinafter **"Cuthbertson"**).

Claims 11 depends from claim 10 and claim 26 depends from claim 25, and the rejection of claims 10 and 16 is premised on the assertion that Randell, Lam, Crane, Anglum, Templeton, Harper, Hey, and Shurling disclose or suggest the features recited in claims 10 and 26 and Cuthbertson discloses or suggests the remaining features of claims 11 and 26. As discussed above, however, Randell, Lam, Crane, Anglum, Templeton, Harper, Hey, and Shurling do not disclose or suggest all features recited in claims 10 and 25. As best understood, Cuthbertson provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 11 and 26 is respectfully requested.

Claims 12 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam and Crane and further in view of Rahn et al. (U.S. Patent Application Publication No. 2004/0054685) (hereinafter “**Rahn**”).

Claims 12 and 14 depend from claim 13, and the rejection of claims 12 and 14 is premised on the assertion that Randell, Crane, and Lam disclose or suggest the features recited in claim 13 and Rahn discloses or suggests the remaining features of claims 12 and 14. As discussed above, however, Randell, Crane, and Lam do not disclose or suggest all features recited in claim 13. As best understood, Rahn provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, withdrawal of the rejection of claims 12 and 14 is respectfully requested.

Claims 22 and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Randell in view of Lam, Crane, Templeton, Harper, and further in view of Kilpatrick.

Claims 22 and 23 depend from claim 21, and the rejection of claims 22 and 23 is premised on the assertion that Randell, Lam, Crane, Anglum, Templeton, and Harper discloses or suggests the features recited in claim 21 and Kilpatrick discloses or suggests the remaining features of claims 22 and 23. As discussed above, however, Randell, Lam, Crane, Anglum, Templeton, and Harper does not disclose or suggest all features recited in claim 21. As best understood, Kilpatrick provides no teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

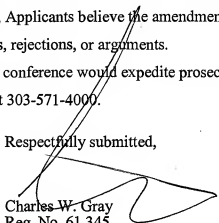
Accordingly, withdrawal of the rejection of claims 22 and 23 is respectfully requested.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested. Applicants do not acquiesce to any objection, rejection, or argument not specifically addressed herein. Rather, Applicants believe the amendments and arguments contained herein overcome all objections, rejections, or arguments.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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